

MOTION TO COMPEL

EXHIBIT G



Attorneys at Law

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April 20, 2007

Via Facsimile and U.S. Mail

Stephen P. Casarino, Esquire
Casarino, Christman & Shalk, PA
800 North King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899

Re: Drexel v. Harleysville Insurance
C.A. No. 05-428 JJF

Dear Steve:

As we discussed today, you agreed to produce Greg Parker as a 30(b)(6) witness with respect to claim policies and procedures in Wilmington on May 7, 2007 at 1:00 p.m. You also indicated Harleysville will produce some form of its policies or procedures in the immediate future, and that you are gathering information regarding the employees identified in the motion to compel.

Sincerely,

Robert K. Beste

rkb@skfdelaware.com

RKB/jcb

Craig B. Smith
Robert J. Katzenstein
David A. Jenkins
Laurence V. Cronin
Michele C. Gott
Thleen M. Miller
Joelle E. Polesky
Roger D. Anderson
Robert K. Beste
Etta R. Wolfe

MOTION TO COMPEL

EXHIBIT H

H

CASARINO, CHRISTMAN & SHALK, P.A.

ATTORNEYS AT LAW

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REPLY TO OUR MAILING ADDRESS:

P.O. BOX 1276

WILMINGTON, DE 19899

STEPHEN P. CASARINO
COLIN M. SHALK
BETH H. CHRISTMAN
DONALD M. RANSOM
KENNETH M. DOSS
THOMAS P. LEFF
MATTHEW E. O'BYRNE
SARAH C. BRANNAN
J'AIME L. WALKER **

RKB

APR 24 2007

** ADMITTED IN PA and NJ ONLY

April 23, 2007

Robert K. Beste, III, Esq.
Smith Katzenstein & Furlow LLP
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899

Re: Drexel v. Harleysville

Dear Bob:


This will confirm that I have made arrangements for Greg Parker of Harleysville to be in Wilmington for a deposition on Monday, May 7 at 1:00 p.m. Mr. Parker is coming from Charlotte, North Carolina.

He has also ordered a copy of the property claims manual which, as I mentioned, is not a hard bound book but is an online document. I should have that to you shortly.

If Mr. Parker does not answer all of your questions concerning procedures, we will then make arrangements for another Harleysville employee to be deposed.

Concerning the list of people you provided, I currently have someone checking to see if they are still employed and if so I will let you know where they live. I shall not produce them for depositions in Delaware, however. We can take their depositions by phone or if you wish travel to their locations.

Very truly yours,


STEPHEN P. CASARINO

SPC:pw

MOTION TO COMPEL

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LAYNE DREXEL,

Plaintiff,

v.

HARLEYSVILLE INSURANCE CO.,

Defendant.

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C.A. No. 05-428 (JJF)

NOTICE OF DEPOSITION

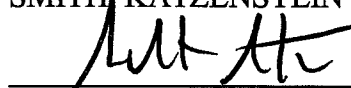
TO: Stephen P. Casarino, Esquire
Casarino, Christman & Shalk, PA
800 North King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899

Pursuant to Federal Rule of Civil Procedure 30(b)(6), examination of Harleysville is requested relevant to the policy of insurance written by Harleysville, specifically Commercial Package Policy No. MPA 812988 (the "Policy"), and concerning the loss at issue in this litigation sustained by plaintiff on June 22, 2004 at the property located at 1740 W. 4th Street in Wilmington, Delaware and the related claim for coverage under the Policy (the "Claim"). The deposition will take place on Monday, May 7, 2007 at 1:00 p.m. at the offices of Smith, Katzenstein & Furlow LLP, 800 Delaware Avenue, Suite 1000, Wilmington, DE. As to all fields of examination, the relevant time period shall be June 2004 through the end of 2004. The fields of examination are as follows:

- (1) Harleysville's policies and procedures with respect to coverage termination and notice thereof to its insured;
- (2) Harleysville's policies and procedures with respect to acceptance and processing of premium payments from insureds, including late premium payments;

- (3) Harleysville's policies and procedures on the effective cancellation date selected by Harleysville when cancelling property insurance;
- (4) Harleysville's policies and procedures with respect to adequate justifications for the cancellation of insurance policies, including the type at issue in this suit and retroactive cancellations after claims have been made on a policy;
- (5) Harleysville's policies and procedures regarding claims notes and notations, including methods of recording and reading claims notes;
- (6) Harleysville's denial of the Claim and cancellation of the Policy at issue;
- (7) The history of the Claim at issue including all direction and communications with third parties or plaintiff;
- (8) All payments made associated with this claim, whether withdrawn or not;
- (9) Harleysville's policy as to the number of cancellation notices required to be sent and the effective date of that cancellation for the type of policy at issue.

SMITH, KATZENSTEIN & FURLOW LLP



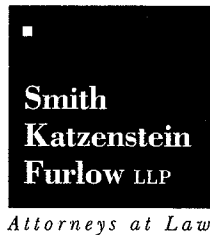
Kathleen M. Miller (ID No. 2898)
Robert K. Beste, III (ID No. 3931)
800 Delaware Avenue, Suite 1000
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Telephone: (302) 652-8400
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*Attorneys for Plaintiff,
Layne Drexel*

April 27, 2007

MOTION TO COMPEL

EXHIBIT J



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April 30, 2007

By Facsimile & U.S. Mail

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Kathleen M. Miller
Joelle E. Polesky
Roger D. Anderson
Robert K. Beste
Etta R. Wolfe

Stephen P. Casarino, Esquire
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800 North King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899

***Re: Drexel v. Harleysville Insurance
C.A. No. 05-428 JJF***

Dear Steve:

This letter will confirm our conversation today. To date, I have not received the policies and procedures requested on numerous occasions, which are necessary for the 30(b)(6) deposition one week from today. Unless I receive those policies and procedures with sufficient time to prepare for the deposition, I cannot proceed with the deposition as scheduled. Please ensure these materials are in my possession prior to the close of business on Wednesday, May 2, 2007, to ensure the deposition proceeds as scheduled. I will not be in the office Thursday or Friday. Also, I have not heard back from you regarding the depositions of the various employees listed in the motion to compel. Please provide dates and locations for these depositions as soon as possible. If we can resolve these matters prior to Wednesday, I will withdraw the motion to compel and obviate the need for a response by the deadline on May 3.

Sincerely,

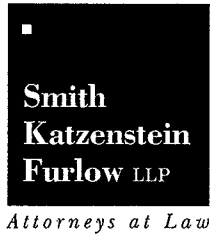
Robert K. Beste

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RKB/vkm

MOTION TO COMPEL

EXHIBIT K



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May 2, 2007

By Facsimile & U.S. Mail

Stephen P. Casarino, Esquire
Casarino, Christman & Shalk, PA
800 North King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899

***Re: Drexel v. Harleysville Insurance
C.A. No. 05-428 JJF***

Dear Steve:

As we discussed today, approximately 6 months ago Harleysville committed to producing all policy and procedure materials in advance of the 30(b)(6) deposition, and it also committed to producing the materials with sufficient time to allow preparation for the deposition. To date, Harleysville has produced nothing. Unless Harleysville physically produces its policy and procedure materials to me prior to 5 p.m. today, plaintiff will vacate the 30(b)(6) notice for Monday and refuse to move forward with the deposition. Further, plaintiff will file a motion to compel a 30(b)(6) deposition in Delaware in the immediate future. I intent to seek fees associated with the motions to compel if another motion becomes necessary.

Also, please address the other issues detailed in my motion to compel in the immediate future, and in writing. Otherwise, I will need to file another motion to compel.

Sincerely,

Robert K. Beste

rkb@skfdelaware.com

RKB/vkm